



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

September 23, 2019

FILED BY ECF

The Honorable Alison J. Nathan
United States District Judge
Southern District of New York
United States Courthouse
40 Foley Square, Courtroom 1306
New York, New York 10007

Re: *United States v. Ali Sadr Hashemi Nejad*, 18 Cr. 224 (AJN)

Dear Judge Nathan:

The Government writes at the Court's direction to inform the Court that the Government produced a set of documents to the defendant on September 17, 2019. Specifically, the Government produced:

- 1,775 documents from email accounts controlled by the defendant (the “Sadr Accounts”) – which were previously produced in discovery.
- 622 documents from accounts controlled by others (the “non-Sadr Accounts”) – which were not previously produced in discovery.

These documents were identified by the District Attorney’s Office (“DANY”) as responsive to the email warrants at issue in this case. As with prior document productions, the Government’s Filter Team provisionally grouped these 2,397 documents—based on search terms—into three categories: (1) non-privileged; (2) possible attorney-client privilege; and (3) possible spousal privilege. The documents were produced as Relativity load files.

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney

by: /s/
Michael Krouse / Jane Kim
Assistant United States Attorneys
Garrett Lynch
Special Assistant United States Attorney
(212) 637-2279 / 2038

cc: Defense Counsel (by ECF)